

Message

From: LEE, LILY [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=D6085A744F9347E6836C54C0E85B97B2-LLEE06]
Sent: 5/4/2016 5:03:30 AM
To: Brasaemle, Karla [KBrasaemle@TechLawInc.com]
Subject: Re: Comments on the Parcel E-2 Draft WP - Shoreline Revetment et al.

Thanks

Lily Lee
USEPA Region 9
Superfund Division
415-947-4187

On May 3, 2016, at 11:37 PM, Brasaemle, Karla <KBrasaemle@TechLawInc.com> wrote:

Hi Lily,

TechLaw's comments on the Draft Work Plan, Shoreline Revetment; Site Grading and Consolidation of Excavated Soil, Sediment, and Debris; and Upland Slurry Wall Installation, Remedial Action, Parcel E-2, Hunters Point Naval Shipyard, San Francisco, California are attached.

There are some significant issues with sequencing of the activities discussed in this work plan with the remaining activities (like wetlands construction and capping the landfill). I am particularly concerned about the plan to strip the top foot off the landfill as this is likely to allow erosion when it rains (the project will take 22-26 months, so it is likely there will be two rainy seasons). The reseeding plan is unlikely to be successful because the top foot is the organic-rich layer that is needed to support vegetation and watering to establish the vegetation is not included. (When the interim cap was constructed, it was necessary to water the seeds and new plants to ensure they would be established before the rains started.) We included General Comment 6 and Specific Comments 2 and 6 to raise these issues.

Also, there are some significant omissions (e.g., See General Comments 3, 7, 8, 10, 11, 12, 18, and Specific Comments 5, 7, 31, and 32).

The discussion of rad-scanning devices in Appendix G is inaccurate (See General Comment 19).

There are a number of comments about inconsistencies that could affect the project if not addressed.

The least important comments are Specific Comments 1, 9, 29, and 30.

Please let me know if you have any questions or want to discuss these comments.

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<HPS789-066 Draft WP_Parcel E-2.doc>